

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

SHIRLEY MACK on behalf of herself and others similarly situated,)	
)	Civil Action No. 1:11-cv-9008
)	
Plaintiffs,)	
)	Judge Kim (by consent)
v.)	
)	
GENERAL MOTORS FINANCIAL COMPANY, INC. f/k/a AMERICREDIT CORP.,)	JURY DEMANDED
)	
Defendant.)	
)	

UNOPPOSED MOTION TO STAY PROCEEDINGS UNTIL AFTER MEDIATION

Pursuant to Fed. R. Civ. P. 6(b), Defendant General Motors Financial Company, Inc. f/k/a AmeriCredit Corp. (together with Plaintiff Shirley Mack, the “Parties”) hereby requests that this Court stay the proceedings in this case until after they have exhausted class mediation efforts. Plaintiff does not oppose this motion. In support of this motion, the Parties state as follows:

1. This is a Telephone Consumer Protection Act case arising out of allegedly improper autodialed telephone calls. AmeriCredit denies that it did anything wrong.
2. The parties have scheduled a mediation in the above-entitled matter before the honorable retired Judge Papas in San Diego for August 15, 2012. The instant case will be mediated in conjunction with another TCPA class action (*Newman v. AmeriCredit Financial Services, Inc.*, Case No. 3:11-cv-03041) pending against Defendant in the Southern District of California.
3. On July 9, 2012 the Court scheduled a hearing on the Motion to Compel for July 17, 2012 at 2:30 p.m. It is the Parties’ hope that the Court is willing to stay all proceedings in

this case, including the hearing on the Motion to Compel, so that the Parties may engage in this mediation in an attempt to resolve this case.

4. It is the Parties intention to litigate the case, including the pending Motion to Compel, if the mediation efforts are unsuccessful, and would request at that time that the Court set case management deadlines sufficient to resolve all discovery and other issues.

WHEREFORE, in light of the pending mediation, Defendant hereby requests that this Court stay the proceedings in this case until after they have exhausted class mediation efforts. Plaintiff does not oppose this motion.

Dated: July 12, 2012

Respectfully submitted,

By: /s/ Chad R. Fuller
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**GENERAL MOTORS FINANCIAL
COMPANY, INC.**

CERTIFICATE OF SERVICE

The undersigned hereby certified that a true and correct copy of the above and foregoing document has been served on July 12, 2012, to all counsel of record who are deemed to have consented to electronic service via the Court's CM/ECF system. Any counsel of record who have not consented to electronic service through the Court's CM/ECF system will be served by electronic mail, first class mail, facsimile and/or overnight delivery.

/s/ Chad R. Fuller

Chad R. Fuller